

BELDOCK LEVINE & HOFFMAN LLP
99 PARK AVENUE, PH/26TH FLOOR
NEW YORK, N.Y. 10016

JONATHAN MOORE
DAVID B. RANKIN
LUNA DROUBI
MARC A. CANNAN
CYNTHIA ROLLINGS
JONATHAN K. POLLACK
HENRY A. DLUGACZ
STEPHEN J. BLUMERT
MYRON BELDOCK (1929-2016)
LAWRENCE S. LEVINE (1934-2004)
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400
FAX: (212) 277-5890
WEBSITE: blhny.com

COUNSEL
BRUCE E. TRAUNER
PETER S. MATORIN
KAREN L. DIPPOLD
MARJORY D. FIELDS
EMILY JANE GOODMAN
(JUSTICE, NYS SUPREME COURT, RET.)
FRANK HANDELMAN

January 19, 2024

REF: 89900.7

WRITER'S DIRECT DIAL:
(212) 277-5825

VIA ECF

Hon. James R. Cho
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Karnes et al v. City of New York et al.*, 21-CV-4903 (WFK) (JRC)

Your Honor:

Plaintiffs' counsel, with consent of defense counsel, respectfully requests additional time to provide information to defendants' counsel to see if the parties can reach an amicable resolution. As You Honor may recall, settlement was reached by two of the four plaintiffs in the matter on December 13, 2024. Their settlement paperwork had been submitted.

At the time of the settlement conference, the defendants sent counsel a list of issues and questions that they had with respect to the remaining plaintiffs. This list was extremely helpful in clarifying what information the plaintiffs need to provide to the defendants to see if there can be a resolution. Some of this information is going to require additional expert reports and evaluations. This process has begun, but we do not currently have a realistic timetable for when it will be completed. We were hoping to be a little further along this road, but the undersigned and Ms. Cohen, the two lead attorneys, have been ill for the balance of January. We are on the mend and endeavoring to complete our assigned tasks promptly.

Respectfully, the parties request that we are allowed to provide the Court with a detailed update on February 16, 2024. The parties thank the Court for its attention to this matter.

Respectfully submitted,



David B. Rankin